

## **Comments on ET Docket No. 03-104 (FCC NOI 03-104), Inquiry Regarding Broadband Over Power Line (BPL).**

My employment is within the wireless mobile communication industry with one of the top suppliers of infrastructure equipment providers for both hardware and software. I am also involved in other aspects of communication, the main one being the amateur radio service. This places me at odds with my career and other communications endeavors.

I have taken time to read NOI ET Docket No. 03-104 and several available responses that reflect both pro and con to the BPL proposal.

Within the current environment the current proposal is expected to create massive interference in a magnitude to render most if not all HF frequencies unusable to those that have been granted permissions to utilize the 6 MHz to 80 Mhz spectrum. This interference will render much of assigned HF frequencies for Maritime Mobile, Aeronautical Mobile, Broadcasting, Radio Astronomy, and Amateur Radio unusable.

The effort at hand is to be applauded. The endeavor must move at a slower pace so as to explore all possible options and take appropriate steps to ensure operation and compliance within the current part 15, especially as it relates to interference of other services. Field testing in both rural and metropolitan areas is a must requirement on successful completion of laboratory testing. A joint team with participation of all interested parties to include current licensed users is required to properly evaluate the results of laboratory testing and make technically sound recommendations to address any issues and establish appropriate initial ground rules. Testing activities require an understanding of what equipment is within different distances of the field trial BPL activity and level of interference documented.

### **Conclusion:**

1. All aspects of BPL need to comply with the current part 15, especially with regard to interference of other authorized users of the frequency.
2. With deregulation with power provider community establishment of responsibility to work spectrum interference is required. Is it point of origin? Is it the owner of the electric distribution grid? Is it the company that maintains distribution grid?
3. Lab trials with participation from other authorized frequency users to determine the viability of BPL and understand its possible negative impact to other authorized frequency users and identify appropriate methods to remove negative effects.
4. Field trials should only be implemented when all authorized users agree that BPL has merit without negatively impacting the spectrum in a negative manner.
5. Field trials should first target rural areas that have activity on the spectrum from as many of the user areas that may be impacted (Maritime Mobile, Aeronautical Mobile, Broadcasting, Radio Astronomy, and Amateur Radio Service, etc).
6. The next step would be rework step 4 to for the trial activities in metropolitan areas.

7. Have an ID that is automatically transmitted in the likelihood of interference so that it can be traced back.

Respectfully,

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